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Representing the United States of America

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

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UNITED STATES OF AMERICA,
Plaintiff,

vs.

RAMON DESAGE,
aka, "RAMON ABI-RACHED,"
aka, "RAYMOND ANTOINE ABI-
RACHED,"

PETER AKARAGIAN, and

GARY PARKINSON,
Defendants.

CASE NO: 2:13-CR-00039-JAD-VCF

**STIPULATION TO CONTINUE
TRIAL DISCLOSURE AND
PRETRIAL MOTION DEADLINES
(FIRST REQUEST)**

It is hereby stipulated and agreed, by and between Dayle Elieson, United States Attorney, through Patrick Burns, Assistant United States Attorney, and Richard Wright, Esq. and George Kelesis, Esq., counsel for Defendant Ramon Desage, and Thomas Pitaro, Esq., counsel for Gary Parkinson, and Anthony Sgro, Esq., counsel for Defendant Peter Akaragian, that the deadline for the Government and Defendants to file trial briefs, exhibit lists, and witness lists, previously scheduled for June 14, 2018, be vacated and reset to June 29, 2018, and that the deadline for filing any pretrial motions, previously set for June 29, 2018, be vacated and reset to July 9, 2018.

This Stipulation is entered into for the following reasons:

1. Calendar call and trial in this case are currently set for August 6 and 14, 2018, respectively.

2. The Court previously ordered the Government and the Defendants to file their trial briefs, exhibit lists, and witness lists by June 14, 2018. The Court also scheduled a deadline for motions in limine to be filed by June 29, 2018.

3. Counsel for the Government and Defendants Desage, Parkinson, and Akaragian are currently engaged in productive negotiations that may resolve the case without a trial.

4. The parties jointly request that the witness, exhibit, and trial brief deadlines be continued to June 29, 2018, and that the deadline for filing pretrial motions be continued until July 9, 2018.

5. This request is made in good faith and not for purposes of delay.

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6. This is the first request for a continuance of the foregoing deadlines.

Dated this 14th day of June, 2018

DAYLE ELIESON
United States Attorney

By: /s/
RICHARD WRIGHT, ESQ.
GEORGE KELESIS, ESQ.
Counsel for Defendant DESAGE

By: /s/
PATRICK BURNS
Assistant United States Attorney

By: /s/
THOMAS PITARO, ESQ.
Counsel for Defendant PARKINSON

By: /s/
ANTHONY SGRO, Esq.
Counsel for Defendant AKARAGIAN

-000-

vs.

FINDINGS OF FACT AND ORDER

GARY PARKINSON,
Defendants.

5. This is the first request for a continuance of the foregoing deadlines.

For all of the above-stated reasons, the ends of justice would be served best by a continuance of the deadlines.

ORDER

IT IS FURTHER ORDERED that the deadline for the Government and the Defendants to file any trial briefs, witness lists, and exhibits lists in *United States v. Ramon Desage, et al.*, 2:13-CR-039-JAD-VCF, previously scheduled for June 14, 2018, is vacated and reset to June 29, 2018. The deadline for filing any pretrial motions, previously set for June 29, 2018, is vacated and reset to July 9, 2018.

DATED this 14th day of June, 2018.

By:

JENNIFER A. DORSEY
United States District Court Judge

Certificate of Service

I, Patrick Burns, hereby certify that I am an employee of the United States Department of Justice, and that on this day I served a copy of the following: **STIPULATION TO CONTINUE GOVERNMENT'S TRIAL DISCLOSURES DEADLINE**, upon counsel for all defendants appearing in this matter via the CM/ECF system, by electronically filing said document.

Dated: June 14, 2018

/s/ Patrick Burns
PATRICK BURNS
Assistant United States Attorney
District of Nevada